

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

IN RE GALENA BIOPHARMA, INC.
SECURITIES LITIGATION,

CASE No.:3:14-cv-00367-SI

**MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND APPROVAL OF
NOTICE PLAN**

Pursuant to Federal Rule of Civil Procedure 23(e) and for the reasons set forth in the accompanying Memorandum of Points and Authorities, Court-appointed Class Representatives Kisuk Cho, Anthony Kim, Pantelis Lavidas, and Joseph Buscema (collectively, “Class Representatives” or “Plaintiffs”), by and through their undersigned attorneys, hereby move this court for entry of an Order (a) preliminarily approving the settlement between Plaintiffs and Defendants Michael McCarthy, The DreamTeam Group, LLC, Lidingo, LLC, and Kamilla Bjorlin (the “Remaining Defendants”) (b) approving the notice to the Class of the Settlement; and (c) setting a hearing date for final approval of the Settlement. The Remaining Defendants do not oppose the relief requested by this motion.

Dated: May 17, 2017

Respectfully submitted,

/s/ Phillip Kim (pro hac vice)

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Class*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record who have consented to electronic notification. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to all non-CM/ECF participants.

DATED: May 17, 2017

/s/ Phillip Kim